

Before the
Federal Communications Commission
Washington, D.C. 20554
FCC Docket No. 93-136
PR Docket No. 93-59

In the Matter of

Amendment of the Commission's
Rules to allocate 449 Mhz
for wind profiler systems.

June 12, 1993

To: The Federal Communications Commission

COMMENTS OF THE OREGON REGION RELAY COUNCIL

- 1 These comments are submitted by the Oregon Region Relay Council (ORRC), the local frequency coordinator for the State of Oregon and south west Washington. The ORRC coordinates Packet AM, FM, VSB, and ACSSB, phone and image stations.

2 **Meteorological aids proposed for inappropriate spectrum**

The ORRC opposes this allocation. The proposed allocation of spectrum is to be used by meteorological aids in a frequency segment allocated to radiolocation. Wind profiler devices would be more appropriately located in frequency segments allocated for meteorological aids. We believe that the proposed allocation is an inappropriate use of shared spectrum.

3 **Non-government expansion objectionable**

We strenuously object to the expansion contained in this docket which would include reallocation of spectrum to new non-government meteorological aids. Further we oppose such an allocation in the shared radiolocation spectrum at 915 MHz. The proposed expansion creates a new user of spectrum while providing no accommodation for the existing sharing partners of the segment.

4 **Need for 400 MHz systems questioned**

We note that, if as asserted by the Radian Corporation, Inc petition, 449 MHz systems provide insufficient resolution at low altitudes, then some doubt is cast upon the effectiveness and need for such 449 MHz systems. We believe a more suitable approach would be to find more appropriate meteorological aid spectrum for profiler systems.

5 **Active bands disrupted**

Further, we note that both of the proposed bands, 449 MHz and 915 MHz are very active and busy bands. Imposing the burden of an additional service on these bands will diminish the useability of the bands.

6 **Technical protection not supported in the docket**

Amateur Radio Service (ARS) frequency coordinators and repeater operators who are most affected by the proposals of this docket were not consulted during discussions on this matter. However, we understand that in discussion between the ARRL and the NTIA, commitments were made to protect ARS repeaters by the use of beam tilt, shielding and other technical means. Although we oppose this reallocation, we also feel that, should this docket be adopted, these commitments should be reflected in the service rules for wind profiler systems.

7 **Frequency Coordinator resource overlooked**

We note that the proposed docket would require notification of repeater operators listed in the ARRL repeater directory. While we agree with the notification requirement, we strongly recommend that local frequency coordinators also be contacted. Local frequency coordinators are listed in the same ARRL directory. They are the only resource that maintains a data base of operating systems, both published and un-published. The limited data contained in the ARRL repeater directory is obtained from these organizations. At best the repeater directory is 8 to 10 months out of date and does not contain un-published listings. Notification of the local frequency coordinators will provide access to the most current and accurate list of ARS operators.

Respectfully submitted,
The Oregon Region Relay Council

A handwritten signature in black ink, appearing to read 'J. White', with a long horizontal stroke extending to the right.

By
John White, K7RUN
Chair, ORRC